

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Oral Argument Requested

**NOTICE OF DEFENDANTS' JOINT MOTION TO EXCLUDE THE  
OPINIONS OF KALIOPI PANAGOS, PHARM.D., R.Ph.**

**PLEASE TAKE NOTICE** that on May 1, 2023, or as soon thereafter as counsel may be heard, Defendants Torrent Pharmaceuticals Ltd., Torrent Pharma Inc., Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis Pharma, Inc., Actavis LLC, Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare US, LLC (collectively, “Defendants”) shall move for an entry of Order excluding the opinions of Plaintiffs’ expert, Kaliopi Panagos, Pharm.D., R.Ph., pursuant to Federal Rules of Evidence 104, 403, 702, and 703.

**PLEASE TAKE FURTHER NOTICE** that in support of their motion, Defendants shall rely upon the Memorandum of Law in Support submitted herewith, and any reply submissions made hereafter, and the Certification of Victoria Davis Lockard, Esq. together with exhibits; and

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted  
herewith; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

Dated: March 13, 2023

Respectfully submitted,

By: /s/ Victoria Davis Lockard  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 13, 2023, a copy of the foregoing document was served on all counsel of record via CM/ECF.

By: /s/ Steven M. Harkins  
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